

SEALED**FILED**

FEB 07 2012

Phil Lombardi, Clerk
U.S. DISTRICT COURT**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,) **Case No. 12 CR 030 JHP**
)
Plaintiff,) **FILED UNDER SEAL**
)
v.) **INDICTMENT**
) **[18 U.S.C. §§ 1591(a)(2), 1594(a) and**
IGNACIO IJOM-BRITO,) **2(a): Sex Trafficking by Force, Fraud**
ANTONIO FELIX VELASQUEZ-) **and Coercion]**
LOPEZ,)
)
Defendants.)

THE GRAND JURY CHARGES:

From on or about January 2012 to on or about January 19, 2012, in the Northern District of Oklahoma and elsewhere, the defendants, **IGNACIO IJOM-BRITO** and **ANTONIO FELIX VELASQUEZ-LOPEZ**, aiding and abetting each other and others known and unknown to the Grand Jury, in and affecting interstate and foreign commerce, knowingly benefitted, and attempted to benefit, financially and by receiving something of value from participation in a venture that engaged in recruiting, enticing, harboring, transporting, providing, obtaining and maintaining AH, a female individual whose identity is known to the Grand Jury, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination of such

means, would be used and were used to cause AH to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591(a)(2), 1594(a), and 2(a).

THOMAS SCOTT WOODWARD
UNITED STATES ATTORNEY

A TRUE BILL



ALLEN J. LITCHFIELD
Assistant United States Attorney

/s/Grand Jury Foreperson

Grand Jury Foreperson